

CLEANUP WORKPLAN

Attleboro Redevelopment Authority Workplan for CERCLA Section 104(k) Cleanup Cooperative Agreement 10/01/2015 – 09/30/2018

1. GOAL 3: Cleaning Up Communities and Advancing Sustainable Development Objective 3.1 Promote Sustainable and Livable Communities

CFDA: 66.818 Assessment, Cleanup, and Revolving Loan Fund Grants

OBJECTIVE: The Small Business Liability Relief and Brownfields Revitalization Act (SBLRBRA) was signed into law on January 11, 2002. The Act amends the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by adding Section 104(k). Section 104(k) authorizes the U.S. Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct planning related to, remediate, or capitalize revolving loan funds for, eligible brownfield sites. Entities are selected from proposals prepared in accordance with the “Proposal Guidelines for Brownfield Assessment, Revolving Loan Fund, and Cleanup Grants,” and submitted in a national competition. The Attleboro Redevelopment Authority, Attleboro Massachusetts as a general purpose unit of local government, was selected for Cleanup funding in the FY 2014 competition.

Our city’s Intermodal Transportation Center/Urban Renewal Project area has been in economic and physical decline for many years, with the possibility of lingering contamination from former commercial operations such as Reynolds & Markman. Remediating brownfields properties in this area will aid the redevelopment of this area in accordance with the City’s Urban Renewal Plan, and bring about a higher use that is more beneficial to the community. The goal of the project to be funded by this cooperative agreement is to remediate the subject brownfields properties and to facilitate the properties’ redevelopment. These goals will be accomplished by performing non-site-specific tasks and site-specific tasks. Non site-specific tasks include hiring a Licensed Site Professional (LSP), obtaining remedial contractor services and performing public outreach. Site-specific tasks include preparing a community relations plan, a QAPP, an ABCA and completing cleanup work under the Massachusetts Contingency Plan (MCP).

Cooperative agreement funding will be used to cover the costs of activities at or in direct support of brownfields sites as defined under CERCLA 101(39). The overall coordination of the cooperative agreement will be carried out by the ARA’s Chairman of the Board of Directors, assisted by the Finance Department Manager and the City Attorney, with technical assistance and oversight to be performed by an environmental consultant working under the MCP.

PROJECT DESCRIPTION AND CLEANUP PLAN: During its operation, Reynolds & Markman stored, repackaged and distributed chemicals used by the jewelry manufacturing industry. The property contained a chemical storage building that burned down in 1989, and this fire resulted in the release of chlorinated solvents including trichloroethylene (TCE). This portion of the site, known as Area 1, includes a source area comprised of impacted soil and a solvent-impacted plume of groundwater that extends downgradient of the source area. A smaller area of lead-impacted soil and groundwater (Area 2) was discovered just north of Area 1. In

addition, a landfill was identified in the central and northern portions of the property (Areas 2 and 3). This landfill contains mostly commercial and industrial debris.

The ARA was awarded three cleanup grants, one for each Area. The cleanup work plans are as follows:

Area 1 includes excavation and off-site disposal of impacted soils near the release area to quickly and efficiently remove the bulk of the source area. This task also includes collection of post-excavation soil samples. To address dissolved VOCs in groundwater, an in-situ chemical oxidation (ISCO) program will be implemented. This program will include injection of an oxidizing agent – likely permanganate or persulfate – into specially designed injection wells that will disperse the oxidant at various levels in the subsurface where needed.

In Area 2 and the southern portion of Area 3 that may be redeveloped for residential or commercial uses, soil and debris will be excavated. Soil from Area 2 will be managed off-site due to impact by lead, which is a source of contamination to groundwater. The excavate from Area 3 will be managed as follows:

- All excavate will be processed through a screener to remove debris greater than about 6”.
- If practical, metal and other recyclables will be removed from the debris for recycling, and the remainder of this material will be taken to a landfill.
- All soil that passes through the screener will be placed in 500 cubic yard stockpiles for further characterization. Samples will be collected for analysis of metals and PAHs. This soil may be reused in areas of the site that are not slated for residential development. If this soil cannot be reused on site, it will be disposed at an off-site facility.

1. FUNDING: \$600,000 Hazardous Substances

2. BUDGET AREA 1:

	Task 1 Cooperative Agreement Oversight	Task 2 Soil Removal	Task 3 Chemical Oxidation	Task 4 Monitoring and Reporting	Total
Personnel					
Fringe Benefits					
Travel	\$2,500				\$2,500
Equipment*					
Supplies	\$2,500				\$2,500
Contractual	\$5,000	\$45,000	\$100,000	\$45,000	\$195,000
Other (specify)					
Total Federal Funding	\$10,000	\$45,000	\$100,000	\$45,000	\$200,000
Cost Share**		\$40,000			\$40,000
Total Budget	\$10,000	\$85,000	\$100,000	\$45,000	\$240,000

* EPA defines equipment as items that cost \$5,000 or more. Items costing less than \$5,000 are considered supplies.

**For each Task which includes an estimated cost share contribution, indicate how the estimate was calculated in a Budget Detail Attachment (Attachment 1).

BUDGET AREA 2:

	Task 1 Cooperative Agreement Oversight	Task 2 Soil and Debris Removal	Task 3 Landfill Capping	Task 4 Monitoring and Reporting	Total
Personnel					
Fringe Benefits					
Travel	\$2,500				\$2,500
Equipment*					
Supplies	\$2,500				\$2,500
Contractual	\$5,000	\$100,000	\$50,000	\$40,000	\$195,000
Other (specify)					
Total Federal Funding	\$10,000	\$100,000	\$50,000	\$40,000	\$200,000
Cost Share**		\$40,000			\$40,000
Total Budget	\$10,000	\$140,000	\$50,000	\$40,000	\$240,000

* EPA defines equipment as items that cost \$5,000 or more. Items costing less than \$5,000 are considered supplies.

**For each Task which includes an estimated cost share contribution, indicate how the estimate was calculated in a Budget Detail Attachment (Attachment 1).

BUDGET AREA 3:

	Task 1 Cooperative Agreement Oversight	Task 2 Soil and Debris Removal	Task 3 Landfill Capping	Task 4 Monitoring and Reporting	Total
Personnel					
Fringe Benefits					
Travel	\$2,500				\$2,500
Equipment*					
Supplies	\$2,500				\$2,500
Contractual	\$5,000	\$100,000	\$50,000	\$40,000	\$195,000
Other (specify)					
Total Federal Funding	\$10,000	\$100,000	\$50,000	\$40,000	\$200,000
Cost Share**		\$40,000			\$40,000
Total Budget	\$10,000	\$140,000	\$50,000	\$40,000	\$240,000

* EPA defines equipment as items that cost \$5,000 or more. Items costing less than \$5,000 are considered supplies.

**For each Task which includes an estimated cost share contribution, indicate how the estimate was calculated in a Budget Detail Attachment (Attachment 1).

3. WORKPLAN TASKS:

Task 1: Cooperative Agreement Oversight

Task 1 - Cooperative Agreement Oversight Subtasks (Commitments) Pre-Cleanup	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Obtain QEP Services <ul style="list-style-type: none"> • Prepare Request For Proposals, evaluate applications, conduct interviews, hire contractor • Prepare scope of work • Prioritize, track and evaluate contractor products • Conduct periodic project status meetings with contractor to discuss project issues and priorities • Conduct annual performance evaluations for contractor 	Outputs: <ul style="list-style-type: none"> • High quality contractor work products that meets the recipient's and EPA's expectations • Confirmation in quarterly report that contractor selection was competed and made Outcomes: <ul style="list-style-type: none"> • Maintain effective work force to meet workplan commitments 	10/2015	
Reporting <ul style="list-style-type: none"> • Prepare quarterly reports, MBE/WBE semi-annually, and FFR form at the end of the reporting period • Enter site data in ACRES • Prepare final report and grant closeout material 	Outputs: <ul style="list-style-type: none"> • Quarterly reports and other forms; updated ACRES database; final report and closeout forms Outcomes: <ul style="list-style-type: none"> • Ensures compliance with Terms & Conditions reporting requirements 	Quarterly reports every quarter; MBE/WBE forms 3/30 & 9/30; ACRES updated when site activities occur	
Request for Reimbursements or Advances	Outputs: <ul style="list-style-type: none"> • Forms submitted to Las Vegas for payment Outcomes: <ul style="list-style-type: none"> • Reduce unliquidated obligations 	Ongoing	
Travel & Training <ul style="list-style-type: none"> • Attend brownfields related meetings, training sessions and conferences 	Outputs: <ul style="list-style-type: none"> • Attend meetings, conferences, training sessions Outcomes: <ul style="list-style-type: none"> • Increase knowledge of brownfields issues and programs 	Ongoing Activity	

Task 2: Community Involvement

Task 2 – Community Involvement Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Work with CBOs identified in proposal to ensure commitments are implemented	Outputs: <ul style="list-style-type: none"> Commitments that were identified in proposal are implemented Outcomes: <ul style="list-style-type: none"> Increase coordination with stakeholders and others 	11/2015	
Prepare Community Relations Plan <ul style="list-style-type: none"> Prepare plan to involve public in cleanup activities 	Outputs: <ul style="list-style-type: none"> Plan for involving the community in cleanup activities Outcomes: <ul style="list-style-type: none"> Improve understanding and participation in cleanup and redevelopment process 	11/2015	
Establish Information Repository	Outputs: <ul style="list-style-type: none"> Repository of documents which allows public to review site assessment & cleanup history Outcomes: <ul style="list-style-type: none"> Improve understanding of how cleanup alternative was selected 		All reports for Attleboro cleanup projects are available on DEP's website
Implement 30-Day Public Comment Period on ABCA	Outputs: <ul style="list-style-type: none"> Allow for review and comment of cleanup related documents Outcomes: <ul style="list-style-type: none"> Allow for consensus on cleanup 	11/2015	
Public Meetings	Outputs: <ul style="list-style-type: none"> Meetings which inform public of cleanup activities and provide a chance for input & comment Outcomes: <ul style="list-style-type: none"> Improve understanding of cleanup and allows for potential modifications based on public input 	11/2015	
Etc.			

Task 3: Cleanup Planning

Task 3 – Cleanup Plan Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Hold a kickoff meeting with State, EPA and QEP	Outputs: <ul style="list-style-type: none"> Held meeting Outcomes: <ul style="list-style-type: none"> Ensure all agencies are in agreement with cleanup plan 	1/2016	
Ensure Site is Enrolled in VCP <ul style="list-style-type: none"> Ensure the grantee has enrolled site in the applicable state response program 	Outputs: <ul style="list-style-type: none"> Site is enrolled in applicable state response program Outcomes: <ul style="list-style-type: none"> Cleanup is in compliance with state response program 		Site in MCP system as of 12/2010
Historic Preservation <ul style="list-style-type: none"> Assist EPA project Officer in collecting information and determining if Section 106 applies 	Outputs: <ul style="list-style-type: none"> Information and reports required to comply with Section 106 historic preservation requirements Outcomes: <ul style="list-style-type: none"> Compliance with Section 106 historic preservation requirements 	Prior to remediation activities	
Prepare Analysis Of Brownfields Cleanup Alternatives (ABCA)	Outputs: <ul style="list-style-type: none"> Approved ABCA documenting how and why cleanup alternative was selected ABCA placed in information repository, etc. Outcomes: <ul style="list-style-type: none"> Ensure proper cleanup alternative is selected and communicated to the public 	1/2016	
Green and Sustainable Remediation (GSR) <ul style="list-style-type: none"> Incorporate green and sustainable remediation principles/techniques into your project 	Outputs: <ul style="list-style-type: none"> GSR language in ABCA and RFP Track and report GSR in quarterly reports Outcomes: <ul style="list-style-type: none"> Greener and more sustainable cleanup 	Before, during, and after remediation activities	

Prepare Decision Document <ul style="list-style-type: none"> • Document results of public comment period and public meeting to include comments received, public meeting attendance, response to relevant comments, selection of final cleanup remedy, any changes to the final cleanup remedy, etc. 	Outputs: <ul style="list-style-type: none"> • Memo or letter, with appropriate attachments Outcomes: <ul style="list-style-type: none"> • Ensure that public comment process is documented and final cleanup remedy is selected 	2/2016	
Prepare Remedial Design & Engineering Documents <ul style="list-style-type: none"> • Prepare appropriate remedial design documents for state response program, engineering design documents for cleanup contractors to perform work (including Davis-Bacon requirements), and a budget detailing how EPA funds will be used to cleanup sites 	<ul style="list-style-type: none"> • Approved remedial action and engineering/design documents and an approved budget • Place documents in information repository, etc. Outcomes: <ul style="list-style-type: none"> • Ensure cleanup will be done in compliance with state response program and EPA funds will be used for eligible costs 	3/2016	
Prepare Site Specific Quality Assurance Project Plan and Health and Safety Plan <ul style="list-style-type: none"> • Prepare a SSQAPP for any environmental post cleanup sampling to be conducted on sites and submit to EPA for approval 	Outputs: <ul style="list-style-type: none"> • EPA approved SSQAPP • Place SSQAPP in information repository Outcomes: <ul style="list-style-type: none"> • Ensure proper confirmatory testing methods and analytical data results are achieved 	3/2016	
Etc.			

Task 4: Oversee Site Cleanup

Task 4 – Oversee Site Cleanup Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
Oversight of cleanup activities <ul style="list-style-type: none"> • QEP conducts appropriate site inspections during remediation to ensure compliance with cleanup plans 	Outputs: <ul style="list-style-type: none"> • Number of inspections • Site reports by QEP • Documents placed in information repository Outcomes: <ul style="list-style-type: none"> • Ensure cleanup is conducted in compliance with VCP 	During remediation activities	
Davis-Bacon Documentation <ul style="list-style-type: none"> • Conduct site inspections to ensure proper wage rates and posters are available to workers on-site • Collect, review and maintain payrolls • Conduct on-site labor interviews 	Outputs: <ul style="list-style-type: none"> • Payrolls, labor interviews, etc. Outcomes: <ul style="list-style-type: none"> • Ensure compliance with Davis-Bacon requirements 	During remediation activities	
Collection of post-cleanup samples	Outputs: <ul style="list-style-type: none"> • Number of samples and analytical results Outcomes: <ul style="list-style-type: none"> • Ensure cleanup has met VCP cleanup levels 	When remediation activities are complete	
Cleanup Documentation <ul style="list-style-type: none"> • Prepare and submit close-out documentation to state indicating that cleanup is complete and protective to human health and the environment and identifies any institutional controls and long term monitoring 	Outputs: <ul style="list-style-type: none"> • Final cleanup reports documenting cleanup is complete • Place documents in repository, etc. Outcomes: <ul style="list-style-type: none"> • State approval of cleanup and ensure cleanup is protective of human health and the environment 	9/2018	
Cleanup Complete Documentation <ul style="list-style-type: none"> • Receive final cleanup complete letter from LSP determination for MA and submit to EPA 	Outputs: <ul style="list-style-type: none"> • Letter from State/LSP • Letter submitted to EPA • Placed letter or documentation in information repository, reported in ACRES, and quarterly reports, etc. Outcomes: <ul style="list-style-type: none"> • Site is officially clean and ready for reuse • # Estimated number of brownfields property acres available for reuse 	9/2018	
Etc.			

5. QUALITY ASSURANCE

Prior to undertaking confirmatory sampling, the ARA will prepare and submit a Quality Assurance Project Plan (QAPP) which meets with the approval of the U.S. EPA Region I Brownfields Program. The QAPP will describe the sampling and analytical strategies, methods, and procedures approved by EPA.

6. PRE-AWARD COSTS

The ARA requests the approval of pre-award costs for this cooperative agreement. It is estimated we will need \$10,000 to do the following activities:

- Complete grant forms and procurement activities

7. ATTACHMENT 1

The detailed budget spreadsheets for each Area are attached.